

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2021-34-E

In the Matter of:)	
)	
Dominion Energy South Carolina,)	
Incorporated's Annual Update on)	PETITION TO INTERVENE
Demand Side Management)	
Programs and Petition to Update)	
Rider)	
)	

The South Carolina Coastal Conservation League (“CCL”), and Southern Alliance for Clean Energy (collectively, “Petitioners”), through counsel, hereby petition the South Carolina Public Service Commission (“Commission”) to intervene in the above-captioned docket pursuant to R.103-825 of the Commission’s rules. In support of this petition, Petitioners state as follows:

1. On January 29, 2021, Dominion Energy South Carolina, Inc. (“DESC” or “Company”) filed an Annual Update on Demand Side Management Programs and a Petition to Update Rider. In its filing, DESC: (1) submits for the Commission’s review information concerning the current status of DESC’s demand reduction and energy efficiency (“DSM/EE”) programs and (2) petitions the Commission for authorization to update its “Rider to Retail Rates – Demand Side Management Component” (“DSM Rider”) to provide for the recovery of costs and net lost revenues associated with its DSM programs and the Commission-approved shared savings incentive for investing in such programs. DESC’s proposed DSM Rider would recover costs and net lost revenues accrued from

December 1, 2019 to November 30, 2020 over a twelve month recovery period, beginning after the first billing cycle of May 2021 and ending with the last billing cycle of April 2022.

2. CCL is a nonprofit corporation organized under the laws of the State of South Carolina. The principal address of CCL is P.O. Box 1765, Charleston, South Carolina 29402. As an advocate for demand side management and energy efficiency, CCL and its members support the development of energy policy that is in the public interest of South Carolinians and promotes energy savings. CCL has members in South Carolina who receive electricity service from DESC and would be subject to the impacts of the Company's DSM/EE programs and proposed DSM Rider. CCL was a party to Docket No. 2009-261-E, and to the settlement agreement adopted and approved by the Commission in Order No. 2010-472, in which the Commission approved DESC's initial DSM/EE programs and rider.

3. SACE is a nonprofit organization whose mission is to promote responsible and equitable energy choices to ensure clean, safe, and healthy communities throughout the Southeast. SACE's principal address is P.O. Box 1842, Knoxville, Tennessee 37901. SACE also has offices in Florida, Georgia, North Carolina, and South Carolina. SACE has members who receive electricity service from DESC and would be subject to the impacts of the Company's DSM/EE programs and proposed DSM Rider. SACE and its members are interested in promoting greater reliance on demand side management and energy efficiency to meet South Carolina's energy needs.

4. Petitioners have participated in prior DESC annual DSM/EE update dockets (CCL participated in Docket Nos. 2011-49-E, 2012-55-E, 2013-50-E, 2014-44-E, 2015-45-E, 2016-40-E, 2017-35-E, 2018-42-E, and 2019-239-E; SACE participated in Docket

Nos. 2012-55-E, 2013-50-E, 2014-44-E, 2015-45-E, 2016-40-E, 2017-35-E, 2018-42-E, and 2019-239-E), as well as Docket No. 2013-208-E, in which DESC's current cost-recovery and incentive mechanism was established. Petitioners also participate in the DESC DSM advisory group process established in Docket No. 2009-261-E.

5. Petitioners seek to intervene in this proceeding to advocate for their members' interests in promoting energy savings through demand side management and energy efficiency. If allowed to intervene, Petitioners will submit comments and/or testimony and participate in a public hearing, should the Commission decide to hold one.

6. Petitioners are represented by the following counsel in this proceeding:

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WHEREFORE, Petitioners pray that they be allowed to intervene in this matter.

Respectfully submitted this 8th day of March, 2021.

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CERTIFICATE OF SERVICE

I hereby certify that the parties listed below have been served via first class U.S. Mail or electronic mail with a copy of the Petition to Intervene of the South Carolina Coastal Conservation League and Southern Alliance for Clean Energy.

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s/Martina R. Cattles

Charleston, South Carolina
March 8, 2021